

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ALEXANDER PAEZ,**

**Plaintiff,**

**v.**

**CHILDREN’S HEALTH SYSTEM OF  
TEXAS,**

**Defendant.**

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**Civil Action No. 3:23-cv-2243-E**

**AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff Alexander Paez (“Plaintiff”) and Defendant Children’s Health System of Texas (“Defendant”) (collectively, the “Parties”) move the Court for the entry of a protective order and respectfully show as follows:

1. Discovery in the above-captioned matter is underway. As a part of the discovery process, the parties anticipate the need to disclose information considered by one or more of the parties to be confidential and/or proprietary in nature.

2. The parties have agreed to terms under which such materials may be marked as confidential, the process by which such materials will be protected from further disclosure, and related procedural matters.

3. Attached hereto as **Exhibit 1** is a copy of the Protective Order sought to be entered by the parties to this matter, which is the approved order available at <https://www.txnd.uscourts.gov/judge/judge-ada-brown> (last accessed March 22, 2024).

WHEREFORE, for the foregoing reasons, the parties request that the Court grant this Agreed Motion for Entry of Protective Order and enter the Protective Order proposed herein.

Respectfully submitted,

**GASPER LAW PLLC**

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will transmit a Notice of Electronic Filing to all parties of record.

/s/ Molly Ann Lawrence

Molly Ann Lawrence